

**UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

LACAZE LAND DEVELOPMENT, LLC
Plaintiff

v.

CIVIL ACTION NO.:1:19-cv-01477

**DEERE & COMPANY, INC. and
W. L. DOGGETT, LLC d/b/a
DOGGETT MACHINERY SERVICES**
Defendants

**CHIEF JUDGE DEE D. DRELL
MAG. JUDGE PEREZ-MONTES**

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MOTION FOR SUMMARY JUDGMENT

Defendant DEERE & COMPANY, INC. submit this Motion for Summary Judgment pursuant to Federal Rule of Procedure 56. For the reasons set for more fully in the attached Memorandum in Support and Statement of Material Facts, Summary Judgment is warranted as a matter of law.

WHEREFORE, Deere respectfully requests that this Court grant its Motion for Summary Judgment and dismiss all claims of Plaintiff, Lacaze Land Development, L.L.C., with prejudice and at plaintiffs' cost.

Respectfully submitted,

/S/ PAUL M. LAVELLE
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ATTORNEYS FOR DEERE & COMPANY, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading was filed electronically with the Clerk of Court, using the CM/ECF system, this 28th day of January, 2021. Notice of filing will be sent to all counsel of record by operation of this Court's electronic filing system.

/s/ PAUL M. LAVELLE
PAUL M. LAVELLE